

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

In re	)	Chapter 11
	)	
Seacrest Equities LLC	)	Case No. 16-43956 (CEC)
	)	
Debtor.	)	
	)	

**NOTICE OF APPEARANCE AND REQUEST  
FOR NOTICES AND PAPERS**

**PLEASE TAKE NOTICE THAT**, the attorneys listed below hereby appear as co-counsel to JPMorgan Chase Bank, National Association (“JPMorgan”) in the chapter 11 case of the above-captioned debtor (the “Debtor”). Pursuant to chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) and pursuant to Rules 2002, 3017(a), 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Bankruptcy Code sections 342 and 1109(b), JPMorgan requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of reorganization, or other documents, filed or entered in these cases, be transmitted to:

**KILPATRICK TOWNSEND & STOCKTON LLP**  
 Maximiliano Rinaldi, Esq.  
 Therese M. Reyes, Esq.  
 The Grace Building  
 1114 Avenue of the Americas, 21<sup>st</sup> Floor  
 New York, New York 10036-7703  
 Telephone: (212) 775-8700  
 Facsimile: (212) 775-8800  
 Email: mrinaldi@kilpatricktownsend.com  
 treyes@kilpatricktownsend.com

**PLEASE TAKE FURTHER NOTICE THAT**, this request includes, without limitation, not only the notices and papers referred to in the provisions specified above, but also

includes orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that (1) affects or seeks to affect in any way the rights or interests of JPMorgan or any other party in interest in these cases, including (a) the Debtor, (b) property of the Debtor or the Debtor's estates, or proceeds thereof, (c) claims against or interests in the Debtor, (d) other rights or interests of creditors of the Debtor or other parties in interest in these cases or (e) property or proceeds thereof in the possession, custody, or control of JPMorgan or others that the Debtor may seek to use or (2) requires or prohibits, or seeks to require or prohibit, any act, delivery of any property, payment or other conduct by JPMorgan or any other party in interest.

**PLEASE TAKE FURTHER NOTICE THAT,** in accordance with Bankruptcy Rule 3017(a), this request also constitutes a request in writing for copies of any disclosure statement or plan filed in these cases.

**PLEASE TAKE FURTHER NOTICE THAT,** neither this notice of appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of JPMorgan (1) to have final judgments and final orders entered by an Article III judge in any matters that constitutionally can be finally adjudicated only by an Article III judge unless all parties consent to final adjudication by a non-Article III judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal or (4) to any other rights, claims, actions, defenses, setoffs or recoupments, under agreements, in law, in

equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 9, 2017  
New York, New York

/s/ Maximiliano Rinaldi

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**KILPATRICK TOWNSEND & STOCKTON LLP**

Maximiliano Rinaldi, Esq. (NY Bar ID No. mr7882)

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*Co-Counsel to JPMorgan Chase Bank, National  
Association*

**CERTIFICATE OF SERVICE**

I, Maximiliano Rinaldi, hereby certify that on the 9<sup>th</sup> day of June, 2017, I served or caused to be served the foregoing **Notice of Entry of Appearance and Request for Notices and Papers** upon the following parties in the manner indicated.

**Debtor**

Seacrest Equities LLC  
269 Forest Avenue  
Staten Island, New York 10301

**First-Class Mail**

**Debtor's Attorney**

Mark A. Frankel  
Backenroth Frankel & Krinsky LLP  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

**First-Class Mail**

**Office of the United States Trustee**

Eastern District of NY (Brooklyn Office)  
U.S. Federal Office Building  
201 Varick Street, Suite 1006  
New York, NY 10014

**First-Class Mail**

**Co-Counsel for JPMorgan Chase Bank,  
National Association**

Melissa Licker, Esq.  
Buckley Madole, P.C.  
420 Lexington Avenue, Suite 840  
New York, New York 10170

**First-Class Mail**